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HIPAA Training Tools and PCS-ing Dilemmas

TRICARE Management Activity, Privacy Office

H I P A A

Maintenance of a complete, accurate and up-to-date record of the HIPAA training status of all MHS personnel is essential to ensure compliance with the HIPAA rules. MHS Privacy Officers are key to satisfying this requirement and must be involved, particularly at the MTF level, with the In and Outprocessing activities for personnel assigned to their units.
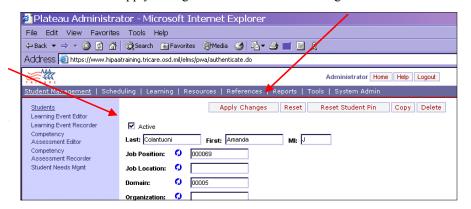
All Services are therefore required to develop policies requiring Privacy Officers to be formally included in the In and Outprocessing activities of their units. A simple way to do this might be to include the Privacy Officer as a required entry in all In and Outprocessing forms.

During Outprocessing, Privacy Officers should determine if there is some reason that the individual will no longer be required to take HIPAA training. For example, the individual may be retiring or otherwise leaving active duty, being assigned to a unit not involved in healthcare activities, or being deployed to an area where HIPAA training is not required. If this is the case the Privacy Officer should INACTIVATE the individual's training record. There is an important caveat to this:

- In no case should a Privacy Officer DELETE a training record. Doing this will remove any record of the individual's past training, and make it impossible to REACTIVATE the training record when the individual returns to an assignment requiring HIPAA training.

The steps necessary to INACTIVATE an individual training record are:

1. Click on Student Management and search for student that needs to be inactivated
2. Click on the "Edit" link to update the profile
3. Uncheck the box labeled "Active"
4. Select the "Apply Changes" button to save the change

In the case where the individual is going to another MTF or medical unit that requires HIPAA training, the Outprocessing Privacy Officer should INACTIVATE the individual's training record as described above.
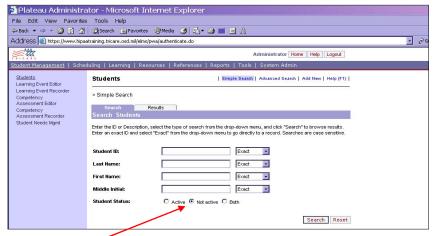
P r i v a c y
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During Inprocessing, receiving unit Privacy Officers simply have to RE-ACTIVATE the individual's record AND change the DOMAIN ID on the individual's record to the designator for the receiving unit. This will automatically make all information on the HIPAA training status and requirements of the individual available to the receiving unit's Privacy Officer. This would also be an excellent time for the Privacy Officer to review that record, explain the unit's commitment to HIPAA and any unit-specific policies and procedures, and provide copies of those documents.

The steps necessary to search, RE-ACTIVATE an individual's training record, and change the Domain ID are:

1. Click on Student Management and select the "Not active" circle at the beginning of the search
2. Search for a student that needs to be Re-Activated

3. Select the "Edit"
4. Check the "Active" box to reactivate the student
5. Locate the Domain field and enter the correct Domain ID
6. Select "Apply Changes" to save the changes